

REMARKS

This amendment is being filed with a Request for Continued Examination (RCE).

The foregoing amendment and the following arguments are provided generally to impart precision to the claims, by more particularly pointing out the claimed subject matter, rather than to avoid prior art.

Claims 1 and 3-13 have been rejected. Claims 10-12 have been cancelled. Claims 1, 3-7, 9, and 13 have been amended. Claims 14-34 have been newly added. Reconsideration and withdrawal of the rejections set forth in the Office Action dated May 1, 2007 are respectfully requested. Support for the added claims is found in the specification, the drawings, and in the claims as originally filed. No new matter has been added.

35 U.S.C. §103 Rejections**Claims 1 and 3-13**

The Examiner has rejected claims 1 and 3-13 under 35 U.S.C. 103(a) as being unpatentable over Wachtel (U.S. Patent No. 6,847,974) in view of Baer et al. (U.S. Patent No. 6,839,701). Applicant respectfully disagrees.

The cited references do not show each and every element as recited in the independent claim 1
Applicant respectfully submits that when viewed as a whole, the cited references Wachtel and Baer do not show the subject matter recited in the pending claims.

MPEP (2143.03) provides

“To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art.

In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974).”

(Manual of Patent Examining Procedure (MPEP) 2143.03).

The cited references do not disclose semantic representations with "metadata or meta-tags that are definable with an ontology" (Claim 1)

Applicant's independent claims 1 and 29 include claimed subject matter neither taught nor suggested by the references. Therefore, Applicant's independent claims are patentable over the references.

For example, in claim 1:

1. A method of semantically representing a target, the method, comprising:

representing a set of attributes of the target with a set of meta-tags, wherein a type of the target is one of a physical entity, a software entity, and an intangible entity;

representing at least one of the set of attributes with metadata associable with at least one of the set of meta-tags;

wherein one or more of the metadata and the at least one of the meta-tags are definable with an ontology

wherein the target is identifiable via one or more of the at least one of the meta-tags and the metadata associated with the target.

The Examiner asserts that Wachtel teaches a semantic object representing an entity or tacit information, where the semantic object comprises semantic tags describing attributes of the entity or tacit information (Page 2 of Office Action mailed May 1, 2007). Applicant respectfully disagrees.

Wachtel discloses a method and apparatus for intelligent data assimilation (Title, Wachtel). The intelligent data assimilation system of Wachtel includes logical search objects that operably connect to external and internal data providers and return search results using an ontology describing atomic data objects and semantic objects (Abstract, Wachtel). However,

applicant submits that Wachtel does not describe, teach, or motivate semantic objects having "metadata and meta-tags that are definable with an ontology", as claimed by applicant in independent claim 1.

The system of Wachtel identifies the ontological relationship between semantic constructs and their associated logical search objects (LSOs) in an ontology (**FIG. 5-6, Wachtel**).

For example, in Wachtel,

"For example, a person semantic is constructed by the underlying atomic or semantic items, first name, middle name, and last name. The definition is used to create a knowledge instance of the ontology, for example when at runtime the ontology is populated with specific semantic and atomic instances returned by the LSOs." (Col. 7, lines 38-44)

In contrast with the claimed invention, in Wachtel, an ontology is populated with semantic instances. The semantic objects of Wachtel do not have metadata and/or meta-tags that are "definable with an ontology".

Baer does not cure the deficiency. Baer discusses a web-based system, method and program product for searching a content object stored in a data repository as a group of hierarchically related content entities (Baer, Abstract) and also does not show semantic objects having "metadata and/or meta-tags that are definable with an ontology".

Therefore, without admitting to the propriety of the combination as suggested by the Examiner, even if Wachtel and Baer were combined, the resulting disclosure would be different from the subject matter disclosed by the applicant in independent claim 1, at least for the above stated reasons. Thus, applicant submits that independent claim 1 is patentable over Wachtel, Baer, and over the combination of Wachtel and Baer.

Applicant's remaining claims depend from one of the foregoing independent claims and therefore incorporate the distinguishing claimed subject matter of the foregoing independent claims. Since the cited references do not show each and every aspect of the independent claim 1, the dependent claims 3-9, and 13 of these independent claims are also patentable over the cited

references, at least for the above stated reasons. The withdrawal of the rejections under 35 U.S.C. §103(a) is respectfully requested for the claims 1, 3-9, and 13.

CONCLUSION

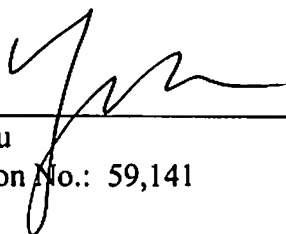
In light of the amendments and the preceding arguments, the applicant respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance.

If the Examiner believes that a conference would be of value in expediting the prosecution of this application, he is cordially invited to telephone the undersigned counsel at (650) 838-4306 to arrange for such a conference.

No fees are believed to be due, however, the Commissioner is authorized to charge any underpayment in fees to Deposit Account No. 50-2207.

Respectfully submitted,

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